

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF OKLAHOMA

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No. 21-CR-314-RAW

BRENDA BURDUE SAVAGE,

Defendant.

FILED
JAN 25 2022

PATRICK KEANEY
Clerk, U.S. District Court
Deputy Clerk

SUPERSEDING INDICTMENT

The Federal Grand Jury charges:

COUNT ONE

SECOND DEGREE MURDER IN INDIAN COUNTRY
[18 U.S.C. §§ 1111(a), 1151, & 1152]

On or about January 30, 2019, within the Eastern District of Oklahoma, in Indian Country, the defendant, **BRENDA BURDUE SAVAGE**, a non-Indian, with malice aforethought, did unlawfully kill Bart Jameson, an Indian, in violation of Title 18, United States Code, Sections 1111(a), 1151, and 1152.

COUNT TWO

**USE, CARRY, BRANDISH, AND DISCHARGE OF A FIREARM DURING AND IN
RELATION TO A CRIME OF VIOLENCE**
[18 U.S.C. § 924(c)(1)(A)]

On or about January 30, 2019, within the Eastern District of Oklahoma, the defendant, **BRENDA BURDUE SAVAGE**, did knowingly use, carry, brandish, and discharge a firearm, during and in relation to a crime of violence for which she may be prosecuted in a court of the United States, to wit: Murder in Indian Country, as alleged in Count One of this Superseding

Indictment, in violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT THREE

**CAUSING THE DEATH OF A PERSON IN THE COURSE OF A VIOLATION OF
TITLE 18 U.S.C. § 924(c)
[18 U.S.C. § 924(j)(1)]**

On or about January 30, 2019, within the Eastern District of Oklahoma, the defendant, **BRENDA BURDUE SAVAGE**, did knowingly use, carry, brandish, and discharge a firearm, during and in relation to a crime of violence for which she may be prosecuted in a court of the United States, to wit: Murder in Indian Country, as alleged in Count One of this Superseding Indictment, and in the course of this violation caused the death of a person through the use of a firearm, which killing is a murder, as defined in Title 18 United States Code § 1111, in that the defendant, **BRENDA BURDUE SAVAGE**, did murder and unlawfully kill Bart Jameson with a firearm in violation of Title 18, United States Code, Section 924(j)(1).

FORFEITURE ALLEGATION
[18 U.S.C. § 924(d) & 28 U.S.C. § 2461(c)]

The allegations contained in Count Two of this Superseding Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c).

Upon conviction of the violations alleged in Count Two of this Indictment involving violations of Title 18, United States Code, Sections 924(c) the defendant, **BRENDA BURDUE SAVAGE**, shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), all firearms, ammunition, magazines, and firearm accessories involved in the commission of the offenses, including, but not limited to:

- One (1) Beretta APX pistol, serial number **A016951X**

A TRUE BILL:

Pursuant to the E-Government Act,
the original indictment has been filed
under seal in the Clerk's Office.

CHRISTOPHER J. WILSON
United States Attorney



MATTHEW P. MATTIS, CA BAR # 225047
TRIAL ATTORNEY
U.S. DEPARTMENT OF JUSTICE

s / Foreperson
FOREPERSON OF THE GRAND JURY